

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JOSEPH MICHAEL PHILLIPS,

Plaintiff,

vs.

**COLLIN COMMUNITY COLLEGE
DISTRICT, et al.**

Defendants.

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Civil Action No. 4:22-cv-184

**AFFIDAVIT OF CHARLES J. CRAWFORD IN SUPPORT
OF DEFENDANTS' BILL OF COSTS**

BEFORE ME, the undersigned notary public, on this day personally appeared Charles J. Crawford, who upon his oath stated as follows:

1. My name is Charles J. Crawford. I am fully competent to make this Affidavit. I have personal knowledge of the facts stated herein, which are true and correct.

2. I am an attorney licensed to practice in the State of Texas and the Eastern District of Texas. I am one of Defendants' attorneys of record in this lawsuit.

3. Defendants have filed the bill of costs attached hereto as Exhibit A. The costs included in the bill are allowed by law, are correctly stated, and were necessarily incurred in the case, and the services for which the costs were charged were actually and necessarily performed. Specifically, Defendants incurred the following recoverable costs:

- a. Fees paid for deposition transcripts in the total amount of **\$16,609.23**, broken down as follows: (1) the oral depositions of the following parties and witnesses in the total amount of **\$8,042.13**: Michael Phillips, Neil Matkin, Mary Barnes-Tilley (individual and corporate representative), Chaelle O'Quin, Abe Johnson,

Kristen Streater, Floyd Nickerson, Mary Weiss, Stacy Donald, and (2) the depositions on written questions of the following entities relating to Plaintiff's alleged damages/mitigation of damages in the total amount of **\$8,567.10**: Baylor University, Blinn College, Devry University, North Central Texas College, Paris Junior College, University of Texas at Dallas, University of Texas at Tyler, Grayson College, Texas Wesleyan University, University of Dallas, Remington College, Austin Community College, Central Texas College, Paul Quinn College, Texas A&M University, University of Houston, Dallas College, Tarleton State University, St. Edwards University, Texas A&M University at Commerce, Kreins Psychological Services, Texas Tech University, Texas Woman's University, Lone Star College, Southern Methodist University, University of Texas Arlington, Navarro College, University of North Texas, Houston Community College, University of Texas at Austin, Western Governors University – Texas. All of the deposed individuals were persons identified by Plaintiff in both disclosures and the pretrial order [Dkt. 87] as potential fact/trial witnesses. All of the depositions on written questions to various colleges/universities related to Plaintiff's mitigation of alleged damages. Thus, at the time each of these depositions was taken, each deposition was necessary to the case and could reasonably be expected to be used by the parties for both summary judgment and trial. Attached hereto as Exhibit B are the accounting entries and invoices supporting these deposition costs.

- b. Costs to produce paper copies, in two three-ring binders, of Defendants' 52 trial exhibits required by the Court pursuant to the Court's Order Regarding Exhibits

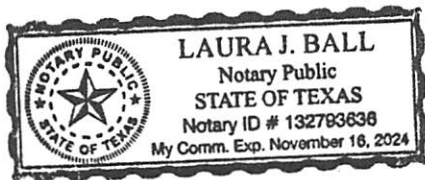
[Dkt. 78], in the total amount of **\$142.80**, which represents 714 copied pages at \$0.20 per page. The amount charged by my firm per page copied reflects the actual cost to the firm to make the copies; there are no additional fees or costs built into the per page copy cost charged by the firm. There is no charge for the three-ring binders.


4. Based on the attached proof, Collin College's recoverable costs total **\$16,752.03**.

Further, affiant sayeth not.


CHARLES J. CRAWFORD

SWORN TO AND SUBSCRIBED before me by the said CHARLES J. CRAWFORD on the 30 day of November 2023.




Notary Public in and for the State of Texas
My commission expires: 11/16/24